



A03-0022 06/18/01

National Environmental Achievement Track

Application Form

Spruance Plant

Name of facility

E.I. duPont deNemours and Co., Inc.

Name of parent company (if any)

5401 Jefferson Davis Highway

Street address

street address

Street address (continued)

Richmond, Virginia 23234

City/State/Zip code

Give us information about your contact person for the
National Environmental Achievement Track Program.

Name Robert L. Dunn

Title Environmental Manager, DuPont Virginia

Phone (804) 383-3895

Fax (804) 383-3785

E-mail Robert.L.Dunn@usa.dupont.com

Why do we need this information?

EPA needs background information on your facility to evaluate your application.

What do you need to do?

- Provide background information on your facility.
- Identify your environmental requirements.

Section A

Tell us about your facility.

1 What do you do or make at your facility?

The DuPont Spruance plant encompasses just under 550 acres, and is located between Route 1/301 (Jefferson Davis Highway) on the West and Interstate Route 95 and the James River on the East. It is just south of the Richmond city boundary line in Chesterfield county, Virginia.

The primary products produced at this site include synthetic fibers, sheets and resins. The products made at this site are used in finished product applications such as: bullet resistant vests for police and the military; fire retardant clothing for fire fighters; hygienic food packaging; light weight molded parts for cars and trucks and vapor barriers/wraps used in housing construction. For more information regarding our facility and our products, visit our web site at <http://virginia.dupont.com>.

2 List the Standard Industrial Classification (SIC) code(s) or North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.

SIC
2824 2821 2297

NAICS

3 Does your company meet the Small Business Administration definition of a small business for your sector?

☐ Yes ☒ No

4 How many employees (full-time equivalents) currently work at your facility?

- ☐ Fewer than 50
☐ 50-99
☐ 100-499
☐ 500-1,000
☒ More than 1,000

Section A, continued

5 Does your facility have an EPA ID number(s)?

☒ Yes

☐ No

If yes, list in the right-hand column.

VAD009305137

6 Identify the environmental requirements that apply to your facility. Use the Environmental Requirements Checklist, at the back of the instructions, as a reference. List your requirements to the right **or** enclose a completed Checklist with your application.

7 Check the appropriate box in the right-hand column.

☐ I've listed the requirements above.

☒ I've enclosed the Checklist with my application.

8 Optional: Is there anything else you would like to tell us about your facility?

At The Corporate Level:

DuPont is on a journey, which was set by the focus of CEO Ed Woolard in 1989 when he defined corporate environmentalism as, "an attitude and a performance commitment that places corporate environmental stewardship fully in line with public desires and expectations." Over the past 10 years, DuPont has moved from meeting the standards of regulatory compliance to improving environmental performance beyond requirements and working hard to earn the trust of the public. Our next initiatives are focused on maintaining public trust by demonstrating sustainable growth with a keen awareness and commitment to conducting business practices in a safe and environmentally conscious manner. DuPont believes that all injuries and occupational illnesses, as well as safety and environmental incidents, are preventable, and our goal for all of them is zero.

In 1992 DuPont restructured its corporate Safety, Health, and Environmental program to focus on Responsible Care®. The new Safety, Health, and Environmental Excellence Center - known as the SHE Excellence Center, provides leadership, and oversight of the six Responsible Care®

Codes for all of the DuPont sites. Through the SHE Excellence Center, several Corporate Goals have been set including a goal for a 90% reduction of air carcinogen emissions, and a goal for a 50% reduction of packaging waste, both by the Year 2000.

At The Business Unit Level

The two major businesses at the Spruance Site are Advanced Fiber Systems (AFS) and Nonwovens (NOW). These businesses continue to make significant progress towards our goal of zero. Continuously improving environmental performance and working towards established goals and targets involves everyone in the business, including manufacturing, maintenance, technical, and other personnel. Consistent with the Corporation's hierarchical approach to handling wastes and emissions, the AFS and NOW businesses give preference to management methods that eliminate or reduce waste and emission generation at the source, followed by methods by which wastes or emitted substances are beneficially reused or recycled. When wastes are generated that can not be reused or recycled, the AFS and NOW businesses ensure that these materials are treated and/or disposed of safely, effectively, and responsibly. The objective is to achieve sustainable growth through integration of business and environmental plans.

The AFS business continues to work in the direction of Sustainable Growth which is defined as "the creation of shareholder and societal value while decreasing our environmental footprint." Sustainable Growth has a triple bottom line:

- ☐ Reducing Safety and Health Incidents and Environmental Footprint
- ☐ Creating Societal Value
- ☐ Creating Shareholder Value

DuPont's "Sustainable Growth 2000 Progress Report" contains the following quote from Charles O. Holliday, Jr., DuPont Chairman and Chief Executive Officer and Chief Safety, Health, and Environmental Officer:

"I am pleased that one of our own business leaders, Diane Gulyas, vice president and general manager of our DuPont Advanced Fiber Systems (AFS) business, has worked with an outside consultant and her business team to create a Sustainable Growth Progress Report for her business unit. In this report, which we believe may be a first for a specific business unit within a corporation, the AFS business commits to specific metrics and goals to create shareholder and societal value while decreasing its environmental footprint. We view this leadership step as an important one as we continue to integrate sustainable growth strategies into the very fabric of our strategic business units."

At the Spruance Site Level:

The Spruance Site is a multi-business site. Four businesses are represented: Advanced Fibers Systems (AFS), Nonwovens (NOW), Engineering Polymers (EP), and Films (DuPont Teijin Films joint venture). These four businesses produce five products: Kevlar® aramid fiber, Nomex® aramid fiber, Teflon® Fiber, Zytel® nylon resin and Tyvek®.

The Spruance Site consists of 550 acres, with approximately 300 acres devoted to industrial use. The remaining acreage is scattered throughout the site and has been certified by the Wildlife Habitat Council as a wildlife habitat area (<http://www.wildlifehc.org/>). These areas are forested, open, buffer zones, and water/wetlands. To maintain certification, Spruance must demonstrate, maintain, and meet outstanding commitment criteria. Renewal is now required every three years and is composed of extensive photographs, and objectives and successes of ongoing programs.

The businesses at the Spruance Site have demonstrated great progress. The use of carbon tetrachloride, carbon disulfide, chlorine and perchloroethylene have been eliminated. Chloroform emissions have been reduced to meet the 90% goal well ahead of the year 2000. The AFS business which represents three of the products on site has reduced the amount of waste landfilled by 78%. Progress and strategies for improvement are shared regularly with members of the community through Spruance's Community Advisory Panel.

DuPont Spruance won the 1999 Commonwealth of Virginia Governor's Award for environmental excellence.

The Site Environmental Manager, Robert L. Dunn won the 1998 Environmental Leadership Award for the private sector based on a survey of 4,000 business and other leaders in Virginia.

The DuPont Spruance Environmental Team participates in a number of community and regional environmental outreach organizations such as: Chesapeake Bay Businesses for the Bay, Friends of Chesterfield's Riverfront, Virginia Manufacturers' Association Community Outreach and Environmental Affairs Committees.

The Spruance site actively participates in the Chesapeake Bay Businesses for the Bay program. It is a voluntary reduction program that gives businesses/industry the opportunity to match their pollution prevention goals and objectives with overall needs and objectives of the Bay. A key element of Businesses for the Bay is the Mentor Program. The mentor program encourages individuals with expertise and/or talents to assist other businesses, who otherwise would not have the resources, in identifying ways to positively impact the environment and the Bay. This

mentoring approach is a win-win situation. The mentors gain personal satisfaction, professional growth and recognition, while the businesses being mentored gain from improved environmental performance. In 1999, Bob Dunn, the Spruance Plant as well as Virginia Environmental Affairs Manager, received the Business for the Bay Mentor of the Year Award.

An auditing program exists at Spruance to improve environmental performance by expanding awareness of environmental matters and by routinely checking compliance with regulations and corporate policies. Spruance has adopted the following framework for its auditing program:

- ☐ Working Principals
- ☐ Focus on Goal of Zero
- ☐ Strive for continual improvement
- ☐ Assess compliance with regulations
- ☐ Review documentation of compliance
- ☐ Review progress of findings from previous audits
- ☐ Improve site awareness of environmental issues
- ☐ Emphasize positive findings

DuPont Spruance employees are very active in a variety of community outreach activities such as the Salvation Army, Christmas In April, the Virginia State University Mathematics and Computer Science Partnership Program, Department of Conservation and Natural Resources Adopt-A-Stream Program, the Bensley Rescue Squad, Shepherd's Club, Elementary School Lunch Buddy Program, Adopt-A- School Program (Oak Grove/Bellemeade Elementary School), Students Reaching Students, Inc., the annual United Way campaign, Big Brothers/Big Sisters Services, Inc., the Boy Scouts of America, the Girl Scouts of America, and Take Your Daughters/Sons to Work Day.

For more information regarding the DuPont Spruance Site, please visit our web site at <http://virginia.dupont.com>.

Why do we need this information?

Facilities need to have an operating Environmental Management System (EMS) that meets certain requirements.

What do you need to do?

- Confirm that your EMS meets the Achievement Track requirements.
- Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS.

Section B

Tell us about your EMS.

1 Check **yes** if your EMS meets the requirements for each element below as defined in the instructions.

a. Environmental policy ☒ Yes

b. Planning ☒ Yes

c. Implementation and operation ☒ Yes

d. Checking and corrective action ☒ Yes

e. Management review ☒ Yes

2 Have you completed at least one EMS cycle (plan-do-check-act)? ☒ Yes

3 Did this cycle include both an EMS and a compliance audit? ☒ Yes

4 Have you completed an objective self-assessment or third-party assessment of your EMS? ☒ Yes

If yes, what method of EMS assessment did you use?

☒ Self-assessment

☐ GEMI

☒ Other

☐ CEMP
Chemistry Council

Responsible Care® (American

☒ Third-party assessment

☐ ISO 14001 Certification

☒ Other Assessment performed by
Environmental Resources Management

Why do we need this information?

Facilities need to show that they are committed to improving their environmental performance. This means that you can describe past achievements and will make future commitments.

What do you need to do?

Refer to the Environmental Performance Table in the instructions to answer questions 1 and 2.

Section C

Tell us about your past achievements and future commitments.

- 1 Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you qualify as a small facility as defined in the instructions, you need to report past achievement for at least one environmental aspect.

First aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Air Carcinogens (AFS)	292,000 in 1987	lbs	9,800 in 1998 9,400 in 2000	lbs lbs
<p>i. How is the current level an improvement over the previous level?</p> <p>97% reduction in our AFS business as of 2000 compared with base year of 1987</p>				
<p>ii. How did you achieve this improvement?</p> <p>This has been a result of implementing full process safety management discipline as well as elimination of two chemicals for process lab testing. Our PSM program involves making continual improvements in leak detection, operator training, equipment reliability, management of change, and auditing. Also, eliminated use of perchloroethylene and carbon tetrachloride as process lab solvents.</p>				

Second aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?	What is the current level?								
Cooling water consumption (Mylar Films)	<table style="width: 100%; border-collapse: collapse;"> <tr> <th style="width: 50%;">Quantity</th> <th style="width: 50%;">Units</th> </tr> <tr> <td style="text-align: center;">1440</td> <td style="text-align: center;">gallons/min.</td> </tr> </table>	Quantity	Units	1440	gallons/min.	<table style="width: 100%; border-collapse: collapse;"> <tr> <th style="width: 50%;">Quantity</th> <th style="width: 50%;">Units</th> </tr> <tr> <td style="text-align: center;">75</td> <td style="text-align: center;">gallons/min.</td> </tr> </table>	Quantity	Units	75	gallons/min.
Quantity	Units									
1440	gallons/min.									
Quantity	Units									
75	gallons/min.									
<p>i. How is the current level an improvement over the previous level?</p> <p>95% reduction in the consumption of cooling water . This reduced the load on the waste water treatment system and also reduced the sludge generated in de-sludging the raw water for the facility.</p> <p>ii. How did you achieve this improvement?</p> <p>This significant improvement was achieved by installing a cooling tower which is used to recycle all non-contact cooling water.</p>										

- 2 Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you are a small facility, you need to make commitments for at least two environmental aspects in two different categories.

First aspect you've selected

- a. What is the aspect? Recycled Material Use (Kevlar® AFS)
- b. Is this aspect identified as significant in your EMS? ☒ Yes ☐ No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- ☒ Option A:
Absolute value 0 lbs/yr
(Quantity/Units)

☐ Option B:
In terms of
units of production (Quantity/Units)
or output

d. What is the level you are committing to achieve over the next three years? You may choose to state this as an absolute level or in terms of units of production or output.

☒ Option A:
Absolute value 180,000 lbs/yr
(Quantity/Units)

☐ Option B:
In terms of
units of production (Quantity/Units)
or output

e. How will you achieve this improvement?

A \$550M project to enable recycling of prepolymer generated during process start-ups and shutdowns was installed and commissioned in the 3Q2000.

Second aspect you've selected

a. What is the aspect?

EPCRA 313 Releases - Carbon Disulfide (Teflon® AFS)

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A:
Absolute value 50,400 lbs/yr
(Quantity/Units)

☐ Option B:
In terms of
units of production (Quantity/Units)
or output

d. What is the level you are committing to achieve over the next three years? You may choose to state this as an absolute level or in terms of units of production or output.

☒ Option A:
Absolute value 0 lbs/yr
(Quantity/Units)

☐ Option B:
In terms of
units of production (Quantity/Units)
or output

e. How will you achieve this improvement?

Replace carbon disulfide with a low hazard/toxicity spin matrix. The new spin matrix is in powder form.

Third aspect you've selected

- a. What is the aspect? Hazardous Waste (Kevlar® AFS)
- b. Is this aspect identified as significant in your EMS? ☒ Yes ☐ No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- | | |
|---|---------------------------------------|
| <input checked="" type="checkbox"/> Option A:
Absolute value | 2,620,592 lbs/yr.
(Quantity/Units) |
| <input type="checkbox"/> Option B:
In terms of
units of production
or output | (Quantity/Units) |
- d. What is the level you are committing to achieve over the next three years? You may choose to state this as an absolute level or in terms of units of production or output.
- | | |
|---|---------------------------------------|
| <input checked="" type="checkbox"/> Option A:
Absolute value | 2,360,000 lbs/yr.
(Quantity/Units) |
| <input type="checkbox"/> Option B:
In terms of
units of production
or output | (Quantity/Units) |
- e. How will you achieve this improvement? Reductions to be achieved through further improvements in first pass yields by improved operator training, procedures, and process technology.

Fourth aspect you've selected

- a. What is the aspect? Non-Hazardous Solid Waste (Nomex® AFS)
- b. Is this aspect identified as significant in your EMS? ☒ Yes ☐ No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- | | |
|---|-------------------------------------|
| <input checked="" type="checkbox"/> Option A:
Absolute value | 196,320 lbs/yr.
(Quantity/Units) |
| <input type="checkbox"/> Option B:
In terms of
units of production
or output | (Quantity/Units) |
- d. What is the level you are committing to achieve over the next three years? You may choose to state this as an absolute level or in terms of units of production or output.
- | | |
|---|------------------------------------|
| <input checked="" type="checkbox"/> Option A:
Absolute value | 98,000 lbs/yr.
(Quantity/Units) |
| <input type="checkbox"/> Option B:
In terms of
units of production
or output | (Quantity/Units) |
- e. How will you achieve this improvement? Installing a new polymer waste recycling system to enable recycling drum and smaller containers of polymer/dimethylacetamide wastes.

Section D

Tell us about your public outreach and reporting.

Why do we need this information?

Facilities need to demonstrate their commitment to public outreach and performance reporting. You should have appropriate mechanisms in place to identify community concerns, to communicate with the public, and to provide information on your environmental performance.

What do you need to do?

- Describe your approach to public outreach.
- List three references who are familiar with your facility.

1 How do you identify and respond to community concerns?

This is done in several ways:

- o Through the Chesterfield County Community Advisory Panel
- o Our good working relationship with the regulatory community
- o Membership on various local community outreach organizations

2 How do you inform community members of important matters that affect them?

This is done in several ways:

- o Same as those listed above
- o Public notices in local newspaper

3 How will you make the Achievement Track Annual Performance Report available to the public?

☒ Website www.virginia.dupont.com (do not type the "www" in the address)

☐ Newspaper

☐ Open Houses

☒ Other

DuPont's Annual Sustainable Growth Progress Report

4 Are there any ongoing citizen suits against your facility? ☐ Yes ☒ No

If yes, describe briefly in the right-hand column.

5 List references below

	<i>Organization</i>	<i>Name</i>	<i>Phone number</i>
<i>Representative of a Community/ Citizen Group</i>	Chesterfield County	Lane Ramsey	(804) 748-1211
	Meadowbrook Civic Association	Edward Martin	(804) 271-1173
<i>State/Local Regulator</i>	Virginia Department of Environmental Quality (DEQ)	Dennis Treacy	(804) 698-4020
	Virginia Department of Environmental Quality (DEQ)	Gerry Seeley	(804) 527-5020
<i>Other community/local reference</i>	Virginia Manufacturers' Association (VMA) Environmental Outreach	Cathy Taylor	(804) 643-7489

Section E

Application and Participation Statement.

On behalf of DuPont Spruance
[my facility],

I certify that

- I have read and agree to the terms and conditions, as specified in the *National Environmental Achievement Track Program Description* and in the *Application Instructions*;
- I have personally examined and am familiar with the information contained in this Application (including, if attached, the Environmental Requirements Checklist). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;
- My facility has an environmental management system (EMS), as defined in the Achievement Track EMS requirements, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- My facility has conducted an objective assessment of its compliance with all federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;
- Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date

Printed Name/Title Robert L. Dunn

Facility Name DuPont Spruance

Facility Street Address 5401 Jefferson Davis Highway
Richmond, Va. 23234

Facility ID Numbers VAD009305137

National Environmental Achievement Track

Environmental Requirements Checklist

We've included the following Checklist to help you answer questions in Section A, Tell us about your facility. The Checklist will help you identify the major federal, state, tribal, and local environmental requirements that apply at your facility, but it is not an exhaustive list of all environmental requirements that may be applicable at your facility.

If you use this Checklist and choose to submit it with your application, fill in your facility information below and enclose the completed Checklist with your application (see instructions).

Air Pollution Regulations

Check All That Apply

- ☒ 1. National Emission Standards for Hazardous Air Pollutants (40 CFR 61)
- ☒ 2. Permits and Registration of Air Pollution Sources
- ☒ 3. General Emission Standards, Prohibitions and Restrictions
- ☐ 4. Control of Incinerators
- ☐ 5. Process Industry Emission Standards
- ☒ 6. Control of Fuel Burning Equipment
- ☒ 7. Control of VOCs
- ☒ 8. Sampling, Testing and Reporting
- ☒ 9. Visible Emissions Standards
- ☒ 10. Control of Fugitive Dust
- ☒ 11. Toxic Air Pollutants Control
- ☐ 12. Vehicle Emissions Inspections and Testing

- ☒ 13. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above

Hazardous Waste Management Regulations

Check All That Apply

- ☒ 1. Identification and Listing of Hazardous Waste (40 CFR 261)
 - ☒ - Characteristic Waste
 - ☒ - Listed Waste
- ☒ 2. Standards Applicable to Generators of Hazardous Waste (40 CFR 262)
 - ☒ - Manifesting
 - ☒ - Pre-transport requirements
 - ☒ - Record keeping/reporting
- ☐ 3. Standards Applicable to Transporters of Hazardous Waste (40 CFR 263)
 - ☐ - Transfer facility requirements
 - ☐ - Manifest system and record-keeping
 - ☐ - Hazardous waste discharges
- ☒ 4. Standards for Owners and Operators of TSD Facilities (40 CFR 264)
 - ☒ - General facility standards
 - ☒ - Preparedness and prevention
 - ☒ - Contingency plan and emergency procedures

- ☒ - Manifest system, Record keeping and reporting
- ☒ - Groundwater protection
- ☒ - Financial requirements
- ☒ - Use and management of containers
- ☐ - Tanks
- ☐ - Waste piles
- ☐ - Land treatment
- ☐ - Incinerators
- ☐ 5. Interim Standards for TSD Owners and Operators (40 CFR 265)
- ☐ 6. Interim Standards for Owners and Operators of New Hazardous Waste Land Disposal Facilities (40 CFR 267)
- ☒ 7. Administered Permit Program (Part B) (40 CFR 270)
- ☐ 8. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above

Hazardous Materials Management

Check All That Apply

- ☒ 1. Control of Pollution by Oil and Other Hazardous Substances (33 CFR 153)
- ☒ 2. Designation of Reportable Quantities and Notification of Hazardous Materials Spill (40 CFR 302)
- ☒ 3. Hazardous Materials Transportation Regulations (49 CFR 172-173)
- ☒ 4. Worker Right-to-Know Regulations (29 CFR 1910.1200)
- ☒ 5. Community Right-to-Know Regulations (40 CFR 350-372)
- ☐ 6. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above

Solid Waste Management

Check All That Apply

- ☐ 1. Criteria for Classification of Solid Waste Disposal Facilities and Practices (40 CFR 257)
- ☐ 2. Permit Requirements for Solid Waste Disposal Facilities
- ☐ 3. Installation of Systems of Refuse Disposal
- ☒ 4. Solid Waste Storage and Removal Requirements
- ☒ 5. Disposal Requirements for Special Wastes
- ☐ 6. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above

Water Pollution Control Requirements

Check All That Apply

- ☒ 1. Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112)
- ☒ 2. Designation of Hazardous Substances (40 CFR 116)

- ☒ 3. Determination of Reportable Quantities for Hazardous Substances (40 CFR 117)
- ☒ 4. NPDES Permit Requirements (40 CFR 122)
- ☐ 5. Toxic Pollutant Effluent Standards (40 CFR 129)
- ☐ 6. General Pretreatment Regulations for Existing and New Sources (40 CFR 403)
Name of POTW
ID # of POTW
- ☒ 7. Organic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 414)
- ☐ 8. Inorganic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 415)
- ☐ 9. Plastics and Synthetics Point Source Effluent Guidelines and Standards (40 CFR 416)
- ☒ 10. Water Quality Standards
- ☒ 11. Effluent Limitations for Direct Dischargers
- ☒ 12. Permit Monitoring/Reporting Requirements
- ☒ 13. Classifications and Certifications of Operators and Superintendents of Industrial Wastewater Plants
- ☒ 14. Collection, Handling, and Processing of Sewage Sludge
- ☒ 15. Oil Discharge Containment, Control and Cleanup
- ☐ 16. Standards Applicable to Indirect Discharges (Pretreatment)
- ☒ 17. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above
Operation and maintenance of Polishing Pond under Virginia Impounding Structures Regulations 4 VAC 50-20-10 et seq.
Operation and Maintenance of sanitary sewer facilities in compliance with Virginia Health Department 12 VAC 5-580-10 "Sewer Regulations" and "Chesterfield County Sewer Ordinance."

Drinking Water Regulations

Check All That Apply

- ☐ 1. Underground Injection and Control Regulations, Criteria and Standards (40 CFR 144, 146)
- ☐ 2. National Primary Drinking Water Standards (40 CFR 141)
- ☐ 3. Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141)
- ☐ 4. Permit Requirements for Appropriation/Use of Water from Surface or Subsurface Sources
- ☐ 5. Underground Injection Control Requirements
- ☐ 6. Monitoring, Reporting and Record keeping Requirements for Community Water Systems
- ☒ 7. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above

From purely a regulatory point of view, the Spruance Site, since it purchases its potable water supply, is not covered under the above listed regulatory areas. The Site does undertake to monitor the quality of potable water distributed thru the Site conveyance piping and follows-up to investigate water user concerns. In compliance with Chesterfield County's "Cross-Connection and Backflow Prevention Control Program", the Site routinely checks backflow control devices using certified inspector. Additionally, the Site follows the American Water Works Association Standard "Disinfection of Water Mains" as would apply to new or repaired piping systems.

Toxic Substances

Check All That Apply

- ☒ 1. Manufacture and Import of Chemicals, Record-keeping and Reporting Requirements (40 CFR 704)
- ☒ 2. Import and Export of Chemicals (40 CFR 707)
- ☒ 3. Chemical Substances Inventory Reporting Requirements (40 CFR 710)
- ☒ 4. Chemical Information Rules (40 CFR 712)
- ☒ 5. Health and Safety Data Reporting (40 CFR 716)
- ☒ 6. Pre-Manufacture Notifications (40 CFR 720)
- ☒ 7. PCB Distribution Use, Storage and Disposal (40 CFR 761)
- ☒ 8. Regulations on Use of Fully Halogenated Chlorofluoroalkanes (40 CFR 762)
- ☐ 9. Storage and Disposal of Waste Material Containing TCDD (40 CFR 775)

- ☐ 10. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above

Pesticide Regulations

Check All That Apply

- ☐ 1. FIFRA Pesticide Use Classification (40 CFR 162)
- ☐ 2. Procedures Storage and Disposal of Pesticides and Containers (40 CFR 165)
- ☐ 3. Certification of Pesticide Applications (40 CFR 171)
- ☐ 4. Pesticide Licensing Requirements
- ☐ 5. Labeling of Pesticides
- ☐ 6. Pesticide Sales, Permits, Records, Application and Disposal Requirements
- ☐ 7. Disposal of Pesticide Containers
- ☐ 8. Restricted Use and Prohibited Pesticides

- ☒ 9. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above
The Site technically is not covered under the above regulatory areas as it contracts thru certified applicators, the use of pesticides, etc. at the Site. The Site does insure that appropriate work practices are utilized by these contractors as they perform contracted services on the Site.

Environmental Clean-Up, Restoration, Corrective Action

Check All That Apply

- ☐ 1. Comprehensive Environmental Response, Compensation and Liability Act (Superfund) (Please identify)

- ☒ 2. RCRA Corrective Action
The Site is currently involved with the EPA on matters related to the Corrective Action Permit dealing with "solid waste management units."
- ☐ 3. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above

Facility Name DuPont Spruance
Facility Location: 5401 Jefferson Davis Highway, Richmond, Va. 23234
Facility ID Number(s): VAD009305137

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